Exhibit A

Proposed Order

UNITED STATES DISTRICT COURT FOR THE DISTRICT OF PUERTO RICO

In re:

THE FINANCIAL OVERSIGHT AND MANAGEMENT BOARD FOR PUERTO RICO,

as representative of

THE COMMONWEALTH OF PUERTO RICO, et al.,

Debtors.¹

PROMESA Title III No. 17 BK 3283-LTS (Jointly Administered)

This filing relates to the Commonwealth and ERS.

ORDER GRANTING FIVE HUNDREDTH OMNIBUS OBJECTION (SUBSTANTIVE) OF THE COMMONWEALTH OF PUERTO RICO AND THE EMPLOYEES RETIREMENT SYSTEM OF THE GOVERNMENT OF THE COMMONWEALTH OF PUERTO RICO TO DEFICIENT ADR CLAIMS

Upon the Five Hundredth Omnibus Objection (Substantive) of the Commonwealth of Puerto Rico and the Employees Retirement System of the Government of the Commonwealth of Puerto Rico to Deficient ADR Claims [ECF No. 21757] (the "Five Hundredth Omnibus Objection"),² filed by the Commonwealth of Puerto Rico (the "Commonwealth") and the Employees Retirement System of the Government of the Commonwealth of Puerto Rico ("ERS, and together with the Commonwealth, the "Debtors"), dated August 5, 2022, for entry of an order disallowing in their entirety certain claims filed against the Debtors, as more fully set forth in the

The Debtors in these Title III Cases, along with each Debtor's respective Title III case number and the last four (4) digits of each Debtor's federal tax identification number, as applicable, are the (i) Commonwealth of Puerto Rico (the "Commonwealth") (Bankruptcy Case No. 17 BK 3283-LTS) (Last Four Digits of Federal Tax ID: 3481); (ii) Puerto Rico Sales Tax Financing Corporation ("COFINA") (Bankruptcy Case No. 17 BK 3284-LTS) (Last Four Digits of Federal Tax ID: 8474); (iii) Puerto Rico Highways and Transportation Authority ("HTA") (Bankruptcy Case No. 17 BK 3567-LTS) (Last Four Digits of Federal Tax ID: 3808); (iv) Employees Retirement System of the Government of the Commonwealth of Puerto Rico ("ERS") (Bankruptcy Case No. 17 BK 3566-LTS) (Last Four Digits of Federal Tax ID: 9686); (v) Puerto Rico Electric Power Authority ("PREPA") (Bankruptcy Case No. 17 BK 4780-LTS) (Last Four Digits of Federal Tax ID: 3747); and (vi) Puerto Rico Public Buildings Authority ("PBA", and together with the Commonwealth, COFINA, HTA, ERS, and PREPA, the "Debtors") (Bankruptcy Case No. 19-BK-5523-LTS) (Last Four Digits of Federal Tax ID: 3801) (Title III case numbers are listed as Bankruptcy Case numbers due to software limitations).

² Capitalized terms not otherwise defined herein shall have the meanings given to such terms in the Five Hundredth Omnibus Objection.

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Five Hundredth Omnibus Objection and supporting exhibits thereto; and the Court having

jurisdiction to consider the Five Hundredth Omnibus Objection and to grant the relief requested

therein pursuant to PROMESA Section 306(a); and venue being proper pursuant to PROMESA

Section 307(a); and due and proper notice of the Five Hundredth Omnibus Objection having been

provided to those parties identified therein, and no other or further notice being required; and each

the claims identified in Exhibit A to the Five Hundredth Omnibus Objection (the "Claims to Be

Disallowed") having been found to be deficient; and the Court having determined that the relief

sought in the Five Hundredth Omnibus Objection is in the best interests of the Debtors, their

creditors, and all parties in interest; and the Court having determined that the legal and factual bases

set forth in the Five Hundredth Omnibus Objection establish just cause for the relief granted herein;

and after due deliberation and sufficient cause appearing therefor, it is hereby

ORDERED that the Five Hundredth Omnibus Objection is GRANTED as set forth

herein; and it is further

ORDERED that the Claims to Be Disallowed are hereby disallowed in their entirety;

and it is further

ORDERED that Kroll is authorized and directed to designate the Claims to Be

Disallowed as expunged on the official claims registry in the Title III Cases; and it is further

ORDERED that this Order resolves Docket Entry No. 21757 in Case No. 17-3283;

and it is further

ORDERED that this Court shall retain jurisdiction to hear and determine all matters

arising from or related to the implementation, interpretation, or enforcement of this Order.

SO ORDERED.

1	Dated:		
	Dated:		

Honorable Judge Laura Taylor Swain United States District Judge

EXHIBIT A

Schedule of Claims Subject to the Five Hundredth Omnibus Objection

	NAME	DATE FILED	CASE NUMBER	DEBTOR	CLAIM#	ASSERTED CLAIM AMOUNT
1	ALIANZA CORRECCIONAL UNIDA SERVIDORES PÚBLICOS MARISEL BAEZ SANTIAGO BANCO COOP PLZ. STE 802B #623 AVE. PONCE DE LEON SAN JUAN, PR 00917-4827	05/29/2018	17 BK 03283-LTS	Commonwealth of Puerto Rico	27520	Undetermined*
	Reason: Proof of Claim purports to assert liabilities associated wit information for the Debtors to understand whether any liabilities a telephone, but claimant either has not responded to Debtors' reque liabilities are owed.	re owed by the Debtors.	The Debtors have made m	ultiple attempts to contact claimant by en	nail, mail, and/or	any
2	ALICEA CAMPOS, MARIA M CALLE CENTRAL #84 COTO LAUREL, P.R.00780 JUANA DIAZ, PR 00780	06/15/2018	17 BK 03283-LTS	Commonwealth of Puerto Rico	50864	Undetermined*
	Reason: Proof of Claim purports to assert liabilities associated wit information for the Debtors to understand whether any liabilities a telephone, but claimant either has not responded to Debtors' reque liabilities are owed.	re owed by the Debtors.	The Debtors have made m	ultiple attempts to contact claimant by en	nail, mail, and/or	any
3	CALAFF QUINONES, MIGUELINA PO BOX 2166 MOCA, PR 00676-2166	05/18/2018	17 BK 03566-LTS	Employees Retirement System of the Government of the Commonwealth of Puerto Rico	42566	Undetermined*
	Reason: Proof of Claim purports to assert liabilities associated wit information for the Debtors to understand whether any liabilities a telephone, but claimant either has not responded to Debtors' reque liabilities are owed.	re owed by the Debtors.	The Debtors have made m	ultiple attempts to contact claimant by en	nail, mail, and/or	any

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	NAME	DATE FILED	CASE NUMBER	DEBTOR	CLAIM#	ASSERTED CLAIM AMOUNT
4	CORNIER MALDONADO, ANGEL A. 17 CALLE ARIES CAROLINA, PR 00979-1712	06/29/2018	17 BK 03283-LTS	Commonwealth of Puerto Rico	142499	Undetermined*
	Reason: Proof of Claim purports to assert liabilities associated wi information for the Debtors to understand whether any liabilities at telephone, but claimant either has not responded to Debtors' requiliabilities are owed.	are owed by the Debtors.	The Debtors have made mu	altiple attempts to contact claimant by er	nail, mail, and/or	any
5	FIGUEROA CORREA, MARIA E HC 11 BOX 47851 CAGUAS, PR 00725-9626	05/25/2018	17 BK 03283-LTS	Commonwealth of Puerto Rico	24005	Undetermined*
	Reason: Proof of Claim purports to assert liabilities associated wi information for the Debtors to understand whether any liabilities at telephone, but claimant either has not responded to Debtors' requiliabilities are owed.	are owed by the Debtors.	The Debtors have made mu	altiple attempts to contact claimant by er	nail, mail, and/or	any
6	FIGUEROA CORREA, MARIA E HC11 BOX 47851 CAGUAS, PR 00725-9626	05/25/2018	17 BK 03283-LTS	Commonwealth of Puerto Rico	24217	Undetermined*
	Reason: Proof of Claim purports to assert liabilities associated wi information for the Debtors to understand whether any liabilities at telephone, but claimant either has not responded to Debtors' requiliabilities are owed.	are owed by the Debtors.	The Debtors have made mu	altiple attempts to contact claimant by er	nail, mail, and/or	any
7	GONZALEZ MERCADO, OMAYRA URB COUNTRY CLUB JC 20 C 230 CAROLINA, PR 00982	06/26/2018	17 BK 03283-LTS	Commonwealth of Puerto Rico	98315	Undetermined*
	Reason: Proof of Claim purports to assert liabilities associated wi information for the Debtors to understand whether any liabilities at telephone, but claimant either has not responded to Debtors' requiliabilities are owed.	are owed by the Debtors.	The Debtors have made mu	altiple attempts to contact claimant by er	nail, mail, and/or	any

^{*}Indicates claim contains unliquidated and/or undetermined amounts

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	NAME	DATE FILED	CASE NUMBER	DEBTOR	CLAIM#	ASSERTED CLAIM AMOUNT
8	IRIZARRY CEDENO, JULIO CESAR BO MACANA SECTOR HOYO VICIOSO CARR. 132 PENUELAS, PR 00624	06/27/2018	17 BK 03283-LTS	Commonwealth of Puerto Rico	149208	Undetermined*
	Reason: Proof of Claim purports to assert liabilities associated wi information for the Debtors to understand whether any liabilities telephone, but claimant either has not responded to Debtors' requiliabilities are owed.	are owed by the Debtors	. The Debtors have made m	ultiple attempts to contact claimant by e	mail, mail, and/or	er any
9	MEDINA HERNANDEZ, MIGDALIA AV DE DIEGO APT 1007 2 COOP SAN FRANCISCO RIO PIEDRAS, PR 00927	05/21/2018	17 BK 03566-LTS	Employees Retirement System of the Government of the Commonwealth of Puerto Rico	17637	Undetermined*
	Reason: Proof of Claim purports to assert liabilities associated wi information for the Debtors to understand whether any liabilities at telephone, but claimant either has not responded to Debtors' requiliabilities are owed.	are owed by the Debtors	. The Debtors have made m	ultiple attempts to contact claimant by e	mail, mail, and/or	er any
10	MEDINA RIVERA, ASNEL EDIF EL CENTRO I 500 AVE. MUÑOZ RIVERA STE 215 SAN JUAN, PR 00918	06/28/2018	17 BK 03283-LTS	Commonwealth of Puerto Rico	63375	Undetermined*
	Reason: Proof of Claim purports to assert liabilities associated wi information for the Debtors to understand whether any liabilities telephone, but claimant either has not responded to Debtors' requiliabilities are owed.	are owed by the Debtors	. The Debtors have made m	ultiple attempts to contact claimant by e	mail, mail, and/or	er any

Exhibit A - Claims to Be Disallowed

	NAME	DATE FILED	CASE NUMBER	DEBTOR	CLAIM#	ASSERTED CLAIM AMOUNT
11	MONTALVO LAFONTAINE, MARIA DE LOS A. 3001 EL COBO AGUADILLA, PR 00603	06/25/2018	17 BK 03283-LTS	Commonwealth of Puerto Rico	111768	Undetermined*
	Reason: Proof of Claim purports to assert liabilities associated wit information for the Debtors to understand whether any liabilities a telephone, but claimant either has not responded to Debtors' reque liabilities are owed.	re owed by the Debtors.	The Debtors have made m	ultiple attempts to contact claimant by en	nail, mail, and/or	any
12	MORALES MONTALVO, FREDDY 15 BO EL COQUI CABO ROJO, PR 00623-3628	05/25/2018	17 BK 03283-LTS	Commonwealth of Puerto Rico	23314	Undetermined*
	Reason: Proof of Claim purports to assert liabilities associated wit information for the Debtors to understand whether any liabilities a telephone, but claimant either has not responded to Debtors' reque liabilities are owed.	re owed by the Debtors.	The Debtors have made m	ultiple attempts to contact claimant by er	nail, mail, and/or	any
13	NEGRON COLON , MIGUEL A. D-14 CALLE 9 URB. REPARTO UNIVERSIDAD SAN GERMAN, PR 00683	06/28/2018	17 BK 03283-LTS	Commonwealth of Puerto Rico	121654	Undetermined*
	Reason: Proof of Claim purports to assert liabilities associated wit information for the Debtors to understand whether any liabilities a telephone, but claimant either has not responded to Debtors' reque liabilities are owed.	re owed by the Debtors.	The Debtors have made m	ultiple attempts to contact claimant by er	nail, mail, and/or	any

Exhibit A - Claims to Be Disallowed

	NAME	DATE FILED	CASE NUMBER	DEBTOR	CLAIM#	ASSERTED CLAIM AMOUNT
14	NIEVES CRUZ, IRIS M. URBANIZACION FACTOR CALLE BALBOA 30-B ARECIBO, PR 00612	06/28/2018	17 BK 03283-LTS	Commonwealth of Puerto Rico	58387	Undetermined*
	Reason: Proof of Claim purports to assert liabilities associated with information for the Debtors to understand whether any liabilities at telephone, but claimant either has not responded to Debtors' requestiabilities are owed.	re owed by the Debtors.	The Debtors have made mu	altiple attempts to contact claimant by em	ail, mail, and/or	r any
15	NIEVES RAMOS, ADELAIDA 2231 CALLE DELTA URB. SAN ANTONIO PONCE, PR 00728-1702	06/27/2018	17 BK 03283-LTS	Commonwealth of Puerto Rico	109002	Undetermined*
	Reason: Proof of Claim purports to assert liabilities associated with information for the Debtors to understand whether any liabilities at telephone, but claimant either has not responded to Debtors' requestiabilities are owed.	re owed by the Debtors.	The Debtors have made mu	altiple attempts to contact claimant by em	ail, mail, and/or	r any
16	ORTIZ LABRADOR, EDNA MARIA APARTADO 2119 AIBONITO, PR 00705	06/25/2018	17 BK 03283-LTS	Commonwealth of Puerto Rico	90181	Undetermined*
	Reason: Proof of Claim purports to assert liabilities associated with information for the Debtors to understand whether any liabilities at telephone, but claimant either has not responded to Debtors' requestiabilities are owed.	re owed by the Debtors.	The Debtors have made mu	altiple attempts to contact claimant by em	ail, mail, and/or	r any

	NAME	DATE FILED	CASE NUMBER	DEBTOR	CLAIM#	ASSERTED CLAIM AMOUNT
17	ORTIZ ROSA, YENICE PO BOX 177 SABANA SECA, PR 00952	06/29/2018	17 BK 03283-LTS	Commonwealth of Puerto Rico	151337	Undetermined*
	Reason: Proof of Claim purports to assert liabilities associated wi information for the Debtors to understand whether any liabilities a telephone, but claimant either has not responded to Debtors' requaliabilities are owed.	are owed by the Debtors.	The Debtors have made m	ultiple attempts to contact claimant by er	nail, mail, and/or	r any
18	PADILLA ORTIZ, MARISEL PO BOX 561136 GUAYANILLA, PR 00656	05/18/2018	17 BK 03283-LTS	Commonwealth of Puerto Rico	16480	Undetermined*
	Reason: Proof of Claim purports to assert liabilities associated wi information for the Debtors to understand whether any liabilities at telephone, but claimant either has not responded to Debtors' requaliabilities are owed.	are owed by the Debtors.	The Debtors have made m	ultiple attempts to contact claimant by er	nail, mail, and/or	r any
19	PEREZ ARCE, HARRY CO NILDA BAEZ ALICEA ECHEANDIA ASOCIADOS P O BOX 140549 ARECIBO, PR 00614-0549	04/24/2018	17 BK 03283-LTS	Commonwealth of Puerto Rico	8217	Undetermined*
	Reason: Proof of Claim purports to assert liabilities associated wi information for the Debtors to understand whether any liabilities at telephone, but claimant either has not responded to Debtors' requaliabilities are owed.	are owed by the Debtors.	The Debtors have made m	ultiple attempts to contact claimant by er	nail, mail, and/or	r any

	NAME	DATE FILED	CASE NUMBER	DEBTOR	CLAIM#	ASSERTED CLAIM AMOUNT
20	PEREZ RAMIREZ, JOSE A URB VALLE VERDE C 9 CALLE 2 SAN GERMAN, PR 00683	05/18/2018	17 BK 03283-LTS	Commonwealth of Puerto Rico	51630	Undetermined*
	Reason: Proof of Claim purports to assert liabilities associated with information for the Debtors to understand whether any liabilities at telephone, but claimant either has not responded to Debtors' requeliabilities are owed.	re owed by the Debtors.	The Debtors have made mu	ultiple attempts to contact claimant by en	nail, mail, and/or	r any
21	RAMOS CAMACHO, DINORIS PO BOX 448 AGUAS BUENAS, PR 00703	05/09/2018	17 BK 03283-LTS	Commonwealth of Puerto Rico	14042	Undetermined*
	Reason: Proof of Claim purports to assert liabilities associated with information for the Debtors to understand whether any liabilities at telephone, but claimant either has not responded to Debtors' requeliabilities are owed.	re owed by the Debtors.	The Debtors have made mu	ultiple attempts to contact claimant by en	nail, mail, and/or	r any
22	RAMOS GONZALEZ, DAVID COLINAS DE FAIRVIEW 4K-29 CALLE 214 TRUJILLO ALTO, PR 00976	06/29/2018	17 BK 03283-LTS	Commonwealth of Puerto Rico	79224	Undetermined*
	Reason: Proof of Claim purports to assert liabilities associated with information for the Debtors to understand whether any liabilities at telephone, but claimant either has not responded to Debtors' requeiliabilities are owed.	re owed by the Debtors.	The Debtors have made mu	ultiple attempts to contact claimant by em	nail, mail, and/or	r any

	NAME	DATE FILED	CASE NUMBER	DEBTOR	CLAIM#	ASSERTED CLAIM AMOUNT
23	RESTO HERNANDEZ, SONIA HC-61 BZN 4359 BO LA GLORIA TRUJILLO ALTO, PR 00976	06/27/2018	17 BK 03283-LTS	Commonwealth of Puerto Rico	101236	Undetermined*
	Reason: Proof of Claim purports to assert liabilities associated with information for the Debtors to understand whether any liabilities at telephone, but claimant either has not responded to Debtors' requestiabilities are owed.	re owed by the Debtors.	The Debtors have made mu	altiple attempts to contact claimant by em	ail, mail, and/or	any
24	REYES HERNANDEZ, INGRID ANTONIO JUSINO RODRÍGUEZ CALLE 90 BL. 91 10 URB. VILLA CAROLINA, PR 00985	06/07/2018	17 BK 03283-LTS	Commonwealth of Puerto Rico	52709	Undetermined*
	Reason: Proof of Claim purports to assert liabilities associated with information for the Debtors to understand whether any liabilities at telephone, but claimant either has not responded to Debtors' requestiabilities are owed.	re owed by the Debtors.	The Debtors have made mu	altiple attempts to contact claimant by em	ail, mail, and/or	any
25	RIOS CRUZ, NILSA HC 11 BOX 12459 HUMACAO, PR 00791-9420	06/29/2018	17 BK 03283-LTS	Commonwealth of Puerto Rico	91272	Undetermined*
	Reason: Proof of Claim purports to assert liabilities associated with information for the Debtors to understand whether any liabilities at telephone, but claimant either has not responded to Debtors' requestiabilities are owed.	re owed by the Debtors.	The Debtors have made mu	altiple attempts to contact claimant by em	ail, mail, and/or	any

					AS	SSERTED CLAIM
	NAME	DATE FILED	CASE NUMBER	DEBTOR	CLAIM#	AMOUNT
26	RIVERA ALVAREZ, CRUZ CALLE LATIMER #1409 SAN JUAN, PR 00940	05/24/2018	17 BK 03283-LTS	Commonwealth of Puerto Rico	38684	Undetermined*
	Reason: Proof of Claim purports to assert liabilities associated with information for the Debtors to understand whether any liabilities at telephone, but claimant either has not responded to Debtors' requestiabilities are owed.	re owed by the Debtors. T	The Debtors have made mu	ltiple attempts to contact claimant by em	ail, mail, and/or	
27	RIVERA OLMEDA, TEODORO BO. LIMON CARR 151 KM 8 HM 0 APT 193 VILLABLA, PR 00766	05/25/2018	17 BK 03283-LTS	Commonwealth of Puerto Rico	35274	Undetermined*
	Reason: Proof of Claim purports to assert liabilities associated with information for the Debtors to understand whether any liabilities at telephone, but claimant either has not responded to Debtors' requestiabilities are owed.	re owed by the Debtors. 7	The Debtors have made mu	ltiple attempts to contact claimant by em	ail, mail, and/or	
28	RIVERA RODRIGUEZ, JOHANNA M. HC-3 BOX 10920 SAN GERMAN, PR 00683	05/21/2018	17 BK 03283-LTS	Commonwealth of Puerto Rico	16862	Undetermined*
	Reason: Proof of Claim purports to assert liabilities associated with information for the Debtors to understand whether any liabilities at telephone, but claimant either has not responded to Debtors' requestiabilities are owed.	re owed by the Debtors. T	The Debtors have made mu	ltiple attempts to contact claimant by em	ail, mail, and/or	

	NAME	DATE FILED	CASE NUMBER	DEBTOR	A CLAIM#	SSERTED CLAIM AMOUNT
29	RIVERA TORRES, ENEIDA 19 SECTOR MAL PASO CARR 386 PENUELAS, PR 00624	05/25/2018	17 BK 03283-LTS	Commonwealth of Puerto Rico	35467	Undetermined*
	Reason: Proof of Claim purports to assert liabilities associated wi information for the Debtors to understand whether any liabilities telephone, but claimant either has not responded to Debtors' requ liabilities are owed.	are owed by the Debtors	s. The Debtors have made m	nultiple attempts to contact claimant by e	mail, mail, and/or	,
30	RODRIGUEZ CANDELARIA, ZULMA I HC 3 BOX 51602 HATILLO, PR 00659	05/23/2018	17 BK 03283-LTS	Commonwealth of Puerto Rico	19638	Undetermined*
	Reason: Proof of Claim purports to assert liabilities associated wi information for the Debtors to understand whether any liabilities telephone, but claimant either has not responded to Debtors' requ liabilities are owed.	are owed by the Debtors	s. The Debtors have made m	nultiple attempts to contact claimant by e	mail, mail, and/or	7
31	SANTIAGO HERNANDEZ, HECTOR MANUEL HC- 02 BOX 5677 COMENO, PR 00782	06/29/2018	17 BK 03283-LTS	Commonwealth of Puerto Rico	145851	Undetermined*
	Reason: Proof of Claim purports to assert liabilities associated wi information for the Debtors to understand whether any liabilities telephone, but claimant either has not responded to Debtors' requ liabilities are owed.	are owed by the Debtors	s. The Debtors have made m	nultiple attempts to contact claimant by e	mail, mail, and/or	7
					TOTAL	Undetermined*